

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

CHARLES BRADY,

Plaintiff,

V.

**SANTANDER CONSUMER USA and
PLATINUM MOTORS GROUP LLC**

Defendants.

Civil Action No. 2:22-cv-05051-GAM

**DEFENDANT PLATINUM MOTORS GROUP LLC'S MOTION TO EXTEND TIME TO
ANSWER, MOVE, OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT**

Defendant Platinum Motors Group LLC (“Defendant Platinum”), through its undersigned counsel, respectfully moves this Honorable Court for an extension of thirty (30) days in which to answer, move, or otherwise respond to the Complaint of *Pro Se* Plaintiff Charles Brady (“Plaintiff”) and, in support thereof, avers as follows:

1. Plaintiff, who is proceeding *pro se* in this matter, filed his Complaint on December 19, 2022. (Dkt. #1.) A copy of the Complaint was handed to a representative of Defendant Platinum at its principal place of business on December 21, 2022. Pursuant to Federal Rule of Civil Procedure 12(a)(1)(A)(i), Defendant Platinum is to file a responsive pleading or motion in response to the Complaint no later than January 11, 2023.

2. Counsel for Defendant Platinum respectfully requests additional time in which to review, comprehend, and respond to Plaintiff's Complaint, which is 232 pages long with exhibits that have been heavily marked up, and which Complaint contains unclear allegations, claims, and prayers for relief.

3. Counsel for Defendant Platinum sought the consent of Plaintiff in obtaining an extension of the deadline by which an answer or other responsive pleading needed to be filed, but Plaintiff refused to provide Defendant Plaintiff with any additional time to respond to the Complaint.

4. Under Federal Rule of Civil Procedure 6(b)(1)(A), the court may, for good cause, extend the time allotted for a party to file a response where a request is made by a party before the original time expires.

5. A brief extension of thirty (30) days for Defendant Platinum to respond to Plaintiff's Complaint, or until February 10, 2023, will provide counsel sufficient time to review and attempt to interpret Plaintiff's allegations and prepare an appropriate response.

6. Counsel for Defendant Platinum has been informed by counsel for Defendant Santander Consumer USA that her client was served with Plaintiff's Complaint on January 4, 2023, requiring Defendant Santander to answer or otherwise respond by January 25, 2023.

7. Plaintiff will not be prejudiced by an order extending Defendant Platinum's deadline to file its response by thirty (30) days.

WHEREFORE, Defendant Platinum Motor Group, LLC respectfully requests this Honorable Court grant its Motion and enter an Order in the form attached hereto.

Date: January 5, 2023

Respectfully submitted,

/s/ Dennis L. Abramson
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Attorneys for Defendant
Platinum Motor Group, LLC

CERTIFICATE OF SERVICE

I, DENNIS L. ABRAMSON, ESQUIRE, hereby certify that on January 5, 2023, a true and correct copy of the foregoing Notice/Entry of Appearance was filed electronically with the Clerk of the United States District Court for the Eastern District of Pennsylvania using CM/ECF, and a copy served via the ECF notification system and/or first-class mail and/or e-mail, addressed as follows:

Mr. Charles Brady
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Attorney for Defendant Santander Consumer USA
(Served via ECF)

DATE: January 5, 2023

/s/ Dennis L. Abramson
Dennis L. Abramson, Esquire